

UNITED STATES DISTRICT COURT
Southern District Of New York

TRANSNATIONAL MANAGEMENT
SYSTEMS II, LLC,

Plaintiff,

-against-

ANTHONY CARCIONE,
BIZ JET CONSULTANTS, LLC, TIM PRERO,
and PEGASUS ELITE AVIATION, INC.,

Defendants.

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) Case No. 14 Civ. 02151 (KBF)

) ECF Case
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Supplemental Declaration of Brendan Collins

1. My name is Brendan Collins. I am a principal at GKG Law, P.C., which has served as lead counsel in this case on behalf of the Defendants, Biz Jet Consultants, LLC and Anthony Carcione ("Biz Jet Defendants"). This Supplemental Declaration is based upon my personal knowledge and my review of GKG Law, P.C.'s files, invoices and records kept in the ordinary course of business.

2. Subsequent to the Court's Granting of the Biz Jet Defendants' Motion to Partially Dismiss the Plaintiffs' Complaint on *forum conveniens* grounds, the Plaintiffs never filed suit against the Biz Jet Defendants in Virginia.

3. All of the \$140,132.50 in attorneys' fees sought in the Motion for Attorneys' Fees and Costs by the Biz Jet Defendants have been paid.

4. All of the \$12,253.55 in expenses sought in the Motion for Attorneys' Fees and Costs by the Biz Jet Defendants have been paid.

5. GKG Law regularly bills its client for Westlaw charges. The Westlaw charges submitted to the Biz Jet Defendants by GKG Law, P.C. are limited to what Westlaw charged GKG Law, and do not include a surcharge.


6. The travel costs sought in the Motion for Attorneys' Fees and Costs are the charges I incurred in traveling to and from Idaho for Anthony Carcione's deposition and my travel to and from New York when I attended hearings in the case.

7. Case Driven Technologies refers to a third party used to copy and produce documents in discovery. The expenses sought are limited to what Case Driven Technologies charges GKG Law, P.C., and do not include a surcharge.

8. Encryptomatic refers to software purchased by GKG Law, P.C. which software was necessary to review emails produced in discovery

Pursuant to the provisions of 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 4, 2016
Washington, DC



Brendan Collins